

DOUGHERTY, RYAN, GIUFFRA, ZAMBITO & HESSION
Attorneys for Defendants
CONTERM HONG KONG LTD. and VANGUARD LOGISTICS
SERVICES HONG KONG LTD.
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PETER J. ZAMBITO (9362 PZ)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ENERGIZER S.A.,

Plaintiff,

- against -

M/V YM GREEN, her engines, boilers and tackle
in rem, YANG MING MARINE TRANSPORT
CORP., YANGMING (UK) LTD., ALL
OCEANS TRANSPORTATION INC.,
KAWASAKI KISEN KAISHA LTD., CONTERM
HONG KONG LTD., VANGUARD LOGISTICS
SERVICES HONG KONG LTD., FIEGE GOTH
CO., LTD. and SHENZHEN HIGH POWER
TECHNOLOGY CO. LTD.,

Defendants.

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ECF CASE

07 Civ. 7406 (LTS)

**ANSWER TO CROSSCLAIM
OF DEFENDANT KAWASAKI
KISEN KAISHA, LTD.**

Defendants, CONTERM HONG KONG LTD. (hereinafter "CONTERM") and
VANGUARD LOGISTICS SERVICES HONG KONG LTD. (hereinafter "VANGUARD"), as
and for their Answer to defendant KAWASAKI KISEN KAISHA, LTD.'s (hereinafter
"KAWASAKI") Crossclaim, allege upon information and belief as follows:

1. Denies having sufficient knowledge or information to form a belief as to the
allegations contained in paragraphs THIRTY-SIXTH through FORTY-SECOND of the
Crossclaim.

2. Admits that defendants CONTERM and VANGUARD were and are corporations organized and existing under the laws of a foreign country and, except as so admitted, denies the allegations contained in paragraph FORTY-THIRD of the Crossclaim and denies having sufficient knowledge or information to form a belief as to the co-defendants.

3. Denies the allegations contained in paragraph FORTY-FOURTH of Crossclaim and denies having sufficient knowledge or information to form a belief as to the co-defendants.

FOR A FIRST, SEPARATE AND COMPLETE DEFENSE

4. CONTERM and VANGUARD adopt all defenses raised in their Answers previously filed, as well as all defenses raised by co-defendants insofar as applicable.

WHEREFORE, defendants CONTERM and VANGUARD demand judgment to dismiss the Crossclaim, together with the costs, disbursements and reasonable counsel fees and for such other or different relief as to this Court may be just in the premises.

Dated: New York, New York
August 27, 2008

DOUGHERTY, RYAN, GIUFFRA, ZAMBITO & HESSION
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CONTERM HONG KONG LTD. and VANGUARD
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S/ _____
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